

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

IN RE:)
)
SABRE DEFENCE INDUSTRIES LLC,) BK NO 11-01431-KL3-11
)
DEBTOR IN POSSESSION)

APPLICATION FOR ORDER APPROVING APPOINTMENT OF CHAPTER 11 TRUSTEE

The United States Trustee hereby applies to the court pursuant to FRBP 2007.1
(c) for approval of the appointment of Michael E. Collins as Chapter 11 Trustee in
the above referenced case and in support thereof, states:

1. The United States Trustee has appointed Michael E. Collins as Chapter 11 Trustee in the above-referenced case subject to his submission, within 10 days of his appointment, all requested background information necessary for the investigation fo him on behalf of the United States Justice Department.
2. The United States Trustee has consulted with the following individuals concerning the appointment of a trustee: Elliott Warner Jones, Sr., attorney for the Debtor in Possession; Robert Welhoelter, Attorney for Worldwide Technologies, Whitworth Tool, Inc.; Gary Chaffin, attorney for Tennessee Commerce Bank; Paul G. Jennings, attorney for Estate of Howard H. Hoffman; Ernest B. Williams, IV, attorney for Cadence Bank, N.A.; and Timothy Niarhos, Attorney for Manroy USA, LLC.

3. To the best of the United States Trustee's knowledge, Michael E. Collins has no connections with the debtor, creditors any other parties in interest, their respective attorneys and accountants, the United States Trustee and persons employed in the Office of the United States Trustee other than as set forth in his Verified Statement attached hereto as Exhibit 1.
4. The United States Trustee requests that this appointment be made effective as of February 23, 2011.

WHEREFORE, the United States Trustee requests entry of the proposed order filed simultaneously herewith approving the appointment of February 23, 2011 as Chapter 11 Trustee in this case and for such other relief as may be necessary and appropriate.

Respectfully submitted,

DANIEL M. MCDERMOTT
UNITED STATES TRUSTEE, REGION 8

/s/ Beth Roberts Derrick

Beth Roberts Derrick, BPR 7138
Assistant United States Trustee
701 Broadway, Room 318
Nashville, TN 37203
Tel: 615-736-2254
Fax: 615-736-2260
Email: beth.r.derrick@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on the 23RD day of February, 2011, a copy of the Appointment of Chapter 11 Trustee was served via email on the debtor's attorneys and all parties which had filed notices of appearance, and a true and exact copy was served via U.S. mail, postage prepaid, to the debtor at the following address:

Sabre Defence Industries, LLC
450 Allied Drive
Nashville, TN 37211

/S/ Beth Roberts Derrick (TN BPR #7138)
Beth Roberts Derrick

IN RE:)	
)	
)	
SABRE DEFENCE INDUSTRIES LLC,)	CASE NO. 3:11-01431
)	CHAPTER 11
)	
DEBTOR.)	JUDGE LUNDIN
)	

I, MICHAEL E. COLLINS, state under penalty of perjury:

566854.1

2. Based upon all information received as of this date concerning this case, I have no connections with the debtor in possession, creditors, any other parties in interest, their respective attorneys and accountants, the United States Trustee or persons employed in the Office of the United States Trustee for Region 8 except as follows:

-- I was formerly employed by the Office of the U.S. Trustee in Nashville, Tennessee, as an attorney. I resigned from that employment in June 2000. During my employment in the U.S. Trustee's Office, I oversaw the Chapter 11 case of Ramo Manufacturing Co., which may have previously owned assets that are now assets of the Debtor.

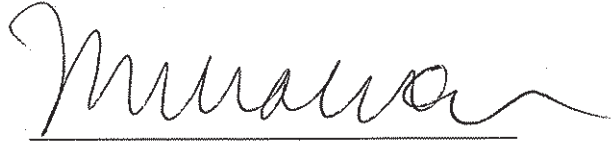
3. For purposes of a lodestar analysis of compensation requested as trustee in this particular case, my initial hourly rate will be \$370. I acknowledge total trustee compensation is subject to the cap set forth in 11 U.S.C. § 326.

4. I agree to provide to the Office of the U.S. Trustee within 10 days of the date of this affidavit all background information necessary for the investigation of me on behalf of the U.S. Department of Justice.

I declare under penalty of perjury, that the foregoing information is true and correct to the best of my knowledge, information and belief.

[REMAINDER OF PAGE INTENTIONALLY BLANK]

Executed in Nashville, Tennessee on this 23rd day of February, 2011.

A handwritten signature in black ink, appearing to read 'Michael E. Collins', written over a horizontal line.

MICHAEL E. COLLINS (#16036)
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